



**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

UNITED STATES OF AMERICA

]

v.

]

No. 3:22-CR-00327-1

JUDGE TRAUGER

]

[1] CHESTER GALLAGHER

]

[2] HEATHER IDONI

]

[3] CALVIN ZASTROW

]

[4] COLEMAN BOYD

]

[6] PAUL VAUGHN

]

[7] DENNIS GREEN

]

**MOTION FOR PERMISSION TO FILE A SURREPLY IN OPPOSITION TO
GOVERNMENT'S REPLY IN SUPPORT OF GOVERNMENT'S MOTION TO
PRECLUDE**

Comes now the Defendants, Chester Gallagher, Heather Idoni, Calvin Zastrow, Coleman Boyd, Paul Vaughan and Dennis Green, by and through undersigned counsel, and moves this Court to allow the Defendants to file a Surreply to the Government's Reply in Support of the Government's Motion to Preclude. (D.E. 412 and 359) The Defendants believe that the Government's Reply misstates the Defendants' position on an issue of particular relevance and importance to the Court's determination. The proposed Surreply has been attached an exhibit below.

Respectfully submitted,

/s/ Manuel B. Russ

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